

# TSD File Inventory Index

Date: January 17, 2002

Initial: C. M. Knease

Facility Name: <u>Cleveland Electric Machinery Company (C.E.M.C.)</u>			
Facility Identification Number: <u>OH 000 772 764</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b>		<b>.1 Correspondence</b>	
<b>.1 Correspondence</b>	✓	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>	
<b>.2 Notification and Acknowledgment</b>	✓	<b>C.1 Compliance - (Inspection Reports)</b>	✓
<b>.3 Part A Application and Amendments</b>	✓	<b>C.2 Compliance/Enforcement</b>	✓
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>		<b>.1 Land Disposal Restriction Notifications</b>	✓
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>	
<b>.6 Annual and Biennial Reports</b>		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	
<b>.1 Correspondence</b>		<b>.1 RFA Correspondence</b>	
<b>.2 Reports</b>		<b>.2 Background Reports, Supporting Docs and Studies</b>	
<b>A.4 Closure/Post Closure</b>	✓	<b>.3 State Prelim. Investigation Memos</b>	
<b>.1 Correspondence</b>	✓	<b>.4 RFA Reports</b>	
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>	✓	<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>	
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>	
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>	
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		<b>D.5 Corrective Action/Enforcement</b>	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		<b>D.6 Environmental Indicator Determinations</b>	
<b>D.3 Corrective Action/Remediation Study</b>		.1 Forms/Checklists	
.1 CMS Correspondence		<b>E. Boilers and Industrial Furnaces (BIF)</b>	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		<b>F Imagery/Special Studies</b> (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		<b>G.1 Risk Assessment</b>	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
<b>D.4 Corrective Action Remediation Implementation</b>		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folders/schedule!*



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor  
Donald R. Schregardus  
Director

March 30, 1993

Cleveland Electric Illuminating Co.  
Attn: Joseph C. Vendel  
2133 Lake Road  
Ashtabula, OH 44004

RECEIVED  
WMD RCRA  
RECORD CENTER

APR 08 1993

RE: EPA ID#: **OHD000772764**

LOCATION of INSTALLATION: *2133 Lake Rd*  
*Ashtabula, OH 44004*

In response to your request of February 1993 the following information has been updated:

Contact: *Joseph C. Vendel (216)994-6900*

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

*Thomas E. Crepeau*

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V  
Ohio EPA District Office







UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

MAY 24 1982

Sylvia Washington  
Ashtabula A-B Electric Generating Plt.  
2133 Lake Road  
Ashtabula Township, Ohio 44004  
RE: Interim Status Acknowledgement  
FACILITY NAME: Ashtabula A-B Electric  
Generating Plant

USEPA ID No. OHD000772764

Dear Ms. Washington:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: John W. Fenker, Vice President

*Handwritten note:* 5/20/82





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

JAN 26 1984

REPLY TO ATTENTION OF:

5HW-13

David W. Whitehead, Senior Counsel  
Cleveland Electric Illuminating Company  
P.O. Box 5000  
Cleveland, OH 44101

RE: Withdrawal of Part A <sup>F</sup>  
(Non-Hazardous Waste)  
FACILITY NAME: Ashtabula A-B Electric Generating Plant  
USEPA ID No.: OHD 000 772 764

Dear Mr. Whitehead:

This to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of September 1, 1983, requesting the withdrawal of your permit application. According to the information which you have submitted, the wastes which are treated, stored or disposed at your facility are not defined as a hazardous waste in 40 CFR 261.3. It is the opinion of this office, based on the information submitted that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with any applicable State and local requirements.

You will retain your USEPA Identification number if you notified that the facility is a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Non-Hazardous Waste)," in all telephone contacts and correspondence.

Sincerely yours,

A handwritten signature in cursive script, reading "Karl J. Klepitsch, Jr.", is written over the typed name.

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

cc: John W. Fenker, Vice President  
Sylvia Washington  
OEPA



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

OH0000772764

REACKNOWLEDGEMENT

INSTALLATION ADDRESS

CLEVELAND ELEC ILUM CO-A & B ELEC GEN PT  
2133 LAKE ROAD  
ASHTABULA OH 44004

2133 LAKE ROAD  
ASHTABULA

OH 44004





U.S. ENVIRONMENTAL PROTECTION AGENCY

## NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000009 AUG 18 80

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., &amp; day)

F 04000077276421

A

800818

CLEVELAND ELEC. ILLUM. CO.

## I. NAME OF INSTALLATION

ASHTABULA - A &amp; B ELECTRIC GENERATING PLANT

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

2133 LAKE ROAD

CITY OR TOWN

ASHTABULA

ST.

ZIP CODE

OH 44004

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

SAME

CITY OR TOWN

ST.

ZIP CODE

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

EXT.

KENNEDY, ALEXANDER MANAGER

216 622 9800

83-26

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

CLEVELAND ELECTRIC ILLUMINATING COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL  
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

040000772764

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980



I.D. - FOR OFFICIAL USE ONLY

S	W	0	H	D	0	0	0	7	7	2	7	6	4	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

**IX. DESCRIPTION OF HAZARDOUS WASTES** (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☒ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)
**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME &amp; OFFICIAL TITLE (type or print)

 Alexander Kennedy  
Plant Manager

DATE SIGNED

8/13/80





# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

September 1, 1983

RECEIVED  
SEP 03 1983  
WASTE MANAGEMENT  
BRANCH

Karl J. Klepitsch, Jr.  
Chief, Waste Management Branch  
USEPA, Region V  
230 South Deerborn Street  
Chicago, Illinois 60604

RE: Permit Application Withdrawal Letter  
FACILITY NAME: Ashtabula A-B Plant  
USEPA ID NO.: OHDO00772764 PA, G, TSD

Dear Mr. Klepitsch:

In accordance with your request of August 4, 1983, The Cleveland Electric Illuminating Company (CEI) is hereby transmitting the following documents regarding the above-named facility:

Exhibit A - Authorized Signature and Certification

Exhibit B - Detailed Technical Justification for Withdrawal Request

Exhibit C - Closure Plan

The Company has previously filed similar information with Ohio EPA requesting withdrawal from the State program.

Should any further documentation be required, please contact me at area code (216) 622-9800, Extension 2340.

Sincerely,

*David W. Whitehead*

David W. Whitehead  
Senior Counsel

DWW:ms

Enclosures

cc: Thomas Carlisle, OEPA  
J. W. Fenker  
M. D. Rider

RECEIVED  
9/6/83

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application for withdrawal and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

DW P.R. *John W. Fenker* 8/31/83  
John W. Fenker  
Vice President-Power Supply



HAZARDOUS WASTE PERMIT WITHDRAWAL REQUEST

The following statement applies to each of The Cleveland Electric Illuminating Company's five electric generating plants with interim status (See Attachment A).

Introduction

Cleaning the water side of a boiler has been a standard practice for decades in the utility industry. The boiler drums and tubes are descaled of the oxide deposits to improve the heat transfer co-efficient and to restore the efficiency performance standard. Most boilers are cleaned on a two to four year cycle. If boiler cleanings were not performed, the industry would be a less reliable generator of electricity. Through the years we have developed a standard chemical cleaning process which includes the chemical treatment, drains and rinses. The chemical cleaning wastes have been determined to be non-hazardous.

Boiler Cleaning Waste Definition

We define the boiler chemical waste as the initial drain plus two clean water rinses. The basis for this definition is based upon boiler chemical cleaning experience in which the boiler cleaning waste solution is drained from the boiler and two rinses are required to assure boiler water quality sufficient to meet CEI standards for boiler light off conditions.

When we filed the permit applications in November, 1980, we were protective filers to assure full compliance with the emerging regulations. During 1981, we sampled the initial drain for boiler cleaning waste characteristics. In 1982, we were defining the waste as the drain plus one rinse. For 1983, after technical review of the 1982 data, we have adopted the definition as the initial drain plus two clean water rinses as a sound approach based upon boiler chemical cleaning experience and water quality.

CEI's sampling procedure is attached for your review. See Attachment B. The procedure identifies how a representative sample will be taken of the drain plus two clean water rinses.

Boiler Cleaning Waste Analyses

During 1982, four out of five facilities conducted boiler chemical cleanings. The three EDTA cleanings (drain and one rinse) were within the RCRA EP toxicity tests limits. The fourth cleaning, a HAF type (drain and one rinse) exceeded

Hazardous Waste Permit Withdrawal Request (Continued)

the 5.0 mg/l limit for total chromium (hexavalent chromium was 0.5 mg/l). However, in both the EDTA and the HAF types, a second rinse is required to assure boiler water quality sufficient to meet CEI standards for boiler light off conditions. If we had used our current boiler cleaning waste definition on 1982 data, the EP toxicity results would have been within the RCRA limits.

CEI's laboratory test results are attached for your review as Attachment C. Please note we have not had an occasion to clean at Ashtabula A and B plants for Unit No. 5. Ashtabula Unit No. 5 is similar in design to Lake Shore Unit 18 and would be cleaned using the same chemicals and procedure as LS-18. Accordingly, we would obtain the same analysis results as for LS-18.

In conclusion, we are requesting that the permits for the five facilities be withdrawn based upon the above technical justification. We have attached the certification of the Company official who signed the original permit applications. If further communications are required on the matter, please contact me at (216) 622-9800, Extension 2340.

RCRA CLOSURE PLAN  
ASHTABULA "A" & "B" PLANT

1. As an owner/operator of a hazardous waste management facility, the Ashtabula "A" & "B" Plant will control, minimize, or eliminate post-closure escape of hazardous waste into the environment by deslagging its boiler units prior to demolition of boilers. Auxiliary equipment such as tanks, pumps and piping will be flushed and cleaned as required.
2. The Ashtabula "A" & "B" Plant presently thermally treats boiler chemical cleaning wastes in the combustion chamber of its boilers.
3. Boiler unit's expected usable life is estimated to be at least equal to that of the plant.
4. Estimated life of the Ashtabula "A" & "B" Plant is undeterminable, but could exceed 20 years.
5. Wastes generated during deslagging and flushing will be tested and shipped off-site if hazardous by a contractor.
6. Estimated closure costs = \$1,000 (cost of labor and disposal).
7. The maximum quantities of boiler chemical cleaning wastes to be thermally treated at any given time during the life of the plant are 282 tons/year.
8. With removal of any hazardous wastes off-site at time of closure decontamination of equipment will not be necessary, due to the nature of those wastes.



ATTACHMENT A

<u>Facility</u>	<u>USEPA ID No.</u>
Ashtabula C Plant 2715 Lake Road Ashtabula Township, Ohio 44004	OHD000816645
Ashtabula A-B Plant 2133 Lake Road	OHD000772764
Avon Lake Plant 33570 Lake Road Avon Lake, Ohio 44012	OHD046629648
Eastlake Plant 10 Erie Road Eastlake, Ohio 44094	OHD094511607
Lake Shore Plant 6800 S. Marginal Drive Cleveland, Ohio 44103	OHD000723411

ATTACHMENT B ✓

CLEVELAND ELECTRIC ILLUMINATING COMPANY  
BOILER CLEANING WASTE SAMPLING PROCEDURE

Boiler Cleaning waste characterizations shall utilize one of the following methods to obtain a representative sample for determining the RCRA compliance status.

1. Units where solution is pumped from boiler to tanks

The chemical drain and first two rinses will be time composited from the pump discharge. The sample size and frequency will be determined by the boiler volume and pump capacity.

2. Units where solution is gravity drained from boiler to tanks

The chemical drain and the first two rinses will be flow/time composited from the drain line. The frequency of sampling will be determined by previous experience with drain time on the unit. The volume of each portion of the composite will be adjusted to reflect the flow rate of the drain. The flow rate will be determined by using one of the following:

- a. Doppler ultrasonic flow meter,
- b. Monitoring volume of solution in the waste tanks, or
- c. Measuring head pressure on boiler.

Prepared by: D. D. Browning

Approved by: REC

R. J. Standish  
R. J. Standish  
General Supervising Engineer  
Engineering Services Section

Date:

4-21-83

## THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

G-2  
REV. 1-82

## MEMORANDUM

☐ I no longer wish to  
receive this material

TO A. J. Kennedy

ROOM AT

FROM

A. R. Brozell

DATE February 8, 1983

PHONE

3267

ROOM TE

SUBJECT

Ashtabula Boiler No. 9

Chemical Cleaning

Waste Solution

Ashtabula C Plant

Please find below a table comparing RCRA limits to the analysis of the wastes generated by the Ashtabula Boiler No. 9 chemical cleaning in March 1982.

	RCRA Limits (ppb)	Ashtabula Boiler No. 9 Waste* (ppb)
Arsenic	5,000	7.5
Barium	100,000	452.5
Cadmium	1,000	110.2
Chromium	5,000	2,130
Lead	5,000	2,818.5
Mercury	200	7.7
Selenium	1,000	15
Silver	5,000	10

\* Values are based on 42,000 gallons--the chemical drain and first rinse drain.

The wastes are classified as nonhazardous according to RCRA definition.

Prepared by D. D. Browning

Reviewed By: *D. J. Saulish*

Date: 2.15.83

ARB:pH *ARB*

cc: N. D. Flack  
D. Rider



## THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

G-2  
REV. 1-82

## MEMORANDUM

☐ I no longer wish to  
receive this materia

TO M. J. Titas

ROOM AV

FROM

A. R. Brozell

DATE February 8, 1983

PHONE

3267

ROOM

TE

SUBJECT

Avon Boiler No. 9

Chemical Cleaning

Waste Solution

Please find below a table comparing RCRA limits to the analysis of the wastes generated by the Avon Boiler No. 9 chemical cleaning in January 1982.

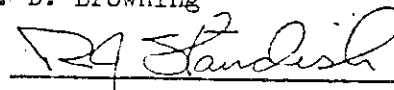
	RCRA Limits (ppb)	Avon Boiler No. 9 Waste* (ppb)
Arsenic	5,000	8.5
Barium	100,000	317.5
Cadmium	1,000	137.5
Chromium	5,000	1,835
Lead	5,000	1,050
Mercury	200	40
Selenium	1,000	70.5
Silver	5,000	100.5

\* Values are based on 72,000 gallons--the chemical drain and first rinse drain.

The wastes are classified nonhazardous according to RCRA definition.

Prepared by D. D. Browning

Reviewed By:



Date:

2-15-83

ARB:PH ARB

cc: N. D. Flack  
D. Rider

## MEMORANDUM

G-2  
REV. 1-82☐ I no longer wish to  
receive this material.

TO R. E. Boals ROOM EL FROM A. R. Brozell DATE February 15, 1983  
 PHONE 3267 ROOM TE  
 SUBJECT Eastlake Unit No. 5  
 Chemical Cleaning  
 Waste Solution

Please find below a table comparing RCRA limits to the analysis of wastes generated by the Eastlake Unit No. 5 chemical cleaning in May 1982.

	RCRA Limits (ppb)	Eastlake Unit No. 5 Waste* (ppb)
Arsenic	5,000	<10
Barium	100,000	45
Cadmium	1,000	2
Chromium	5,000	7,500 (500 ppb Hexavalent chromium)
Lead	5,000	<10
Mercury	200	8.0
Selenium	1,000	68
Silver	5,000	<1

\*Values are based on 132,600 gallons--the chemical drain and first rinse drain.

The sampling of the chemical drain and the first rinse drain was not representative of the total waste generated. For a HAF cleaning the Chemical Engineering Unit has determined that the drain plus two rinses is more representative of the actual waste generated. Actually, a total of 500,000 gallons were thermally treated because of leaking valves. If the more representative sampling had been used all the limits would probably have been met. However, practically all of the chromium, the only element of any significant concentration, was present in the less toxic valence state.

Thus, we believe the concentrations were safe, but treated as hazardous.

Prepared by D. D. Browning

Reviewed by *R. J. Sandesh*

Date 2-15-83

ARB:tt *ARB*

cc: N. D. Flack  
D. Rider

## THE CLEVELAND ELECTRIC ILLUMINATION COMPANY

G-2  
REV. 1-82

## MEMORANDUM

☐ I no longer wish to  
receive this material

TO W. C. Roberts

ROOM LS

FROM

A. R. Brozell

DATE February 8, 1983

PHONE

3267

ROOM TE

SUBJECT

Lake Shore Unit 18

Chemical Cleaning

Waste Solution

Please find below a table comparing RCRA limits to the analysis of the wastes generated by the Lake Shore Unit 18 chemical cleaning in November 1982.

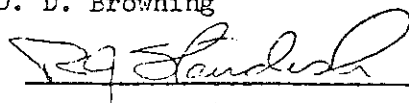
	RCRA Limits (ppb)	Lake Shore Unit 18 Waste* (ppb)
Arsenic	5,000	31.3
Barium	100,000	291
Cadmium	1,000	21.5
Chromium	5,000	2,642
Lead	5,000	1,302
Mercury	200	< 1.0
Selenium	1,000	< 20
Silver	5,000	225

\* Values are based on 105,000 gallons--the chemical drain and first and second rinse drains.

The wastes are classified nonhazardous according to RCRA definition.

Prepared by D. D. Browning

Reviewed By:



Date:

2-15-83ARB:PH *ARB*cc: N. D. Flack  
D. Rider





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
5HW-13

AUG 4 1983

David Whitehead, Senior Counsel  
Cleveland Electric Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

RE: Permit Application Withdrawal Letter  
FACILITY NAME: Ashtabula A-B Electric Generating Plant  
U.S. EPA ID NO.: OHD 000 772 764

Dear Mr. Whitehead:

This is to acknowledge receipt of your letter of October 13, 1982, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Karl J. Klepitsch, Jr.", written in a cursive style.

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: John W. Fenker, Vice President  
Sylvia Washington

*Serving The Best Location in the Nation*

October 13, 1982

RECEIVED

OCT 18 1982

WASTE MANAGEMENT BRANCH  
EPA. REGION V

Karl J. Klepitsch, Jr.  
Chief Waste Management Branch  
U. S. Environmental Protection  
Agency, Region V  
111 West Jackson Boulevard  
Chicago, Illinois 60604

Re: Part A Application - Non-Hazardous Waste: The Cleveland  
Electric Illuminating Company.

Dear Mr. Klepitsch:

I am writing in response to your letter of September 29, 1982 to Mr. Ronald Boals of The Cleveland Electric Illuminating Company's (CEI) Eastlake Plant regarding the necessity for that facility to maintain a Part A Hazardous Waste Permit under Section 3005 of the Resource Conservation and Recovery Act as amended. The statements made in your letter apply to each of the Company's five electric generating plants with interim status (see "Attachment A").

Since filing the USEPA Part A Application in November of 1980 and subsequently obtaining a hazardous waste permit from the Ohio Hazardous Waste Facility Approval Board in 1981, CEI has determined that the facilities listed in "Attachment A" treat or dispose of wastes which are either non-hazardous or excluded from regulation under 40 CFR Part 261. Pursuant to this status CEI is hereby requesting that the Company's Part A Applications for the five referenced facilities be withdrawn for the reasons outlined in the attached explanation (Attachment B). We would also ask that your office return to the Company the Part A Applications previously filed.

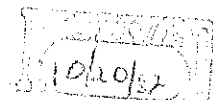
Any requests for further clarification or details regarding this subject matter may be addressed to my attention.

Sincerely,

*David W. Whitehead*  
David W. Whitehead  
Senior Counsel

DWW:ms

cc: C. Rush, General Supervising Engineer  
Environmental & Control Section



ATTACHMENT A

<u>Facility</u>	<u>USEPA ID No.</u>
Ashtabula C Plant 2715 Lake Road Ashtabula Township, Ohio 44004	OHD000816645 G, TSD, PA <i>new</i>
Ashtabula A-B Plant 2133 Lake Road	OHD000772764 G, TSD, PA <i>new</i>
Avon Lake Plant 33570 Lake Road Avon Lake, Ohio 44012	OHD046629648 G, TSD, PA <i>new</i>
Eastlake Plant 10 Erie Road Eastlake, Ohio 44094	OHD094511607 G, TSD, PA <i>new</i>
Lake Shore Plant 6800 S. Marginal Drive Cleveland, Ohio 44103	OHD000723411 G, TSD, PA <i>new</i>



ATTACHMENT B

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY  
Request for Withdrawal of  
Part A Applications

The Cleveland Electric Illuminating Company in November of 1980 filed Part A Permit Applications for the facilities enumerated in Attachment A in order to obtain interim status under the Federal regulations promulgated pursuant to the Resource Conservation and Recovery Act. Upon request of the Ohio Environmental Protection Agency CEI later filed with the Ohio Hazardous Waste Facility Approval Board photostatic copies of the Part A Applications and was subsequently granted hazardous waste permits by the State of Ohio HWFAB.

Review of the RCRA Act and regulations as well as amendments to both led the Company to conclude that a review of its waste handling procedures was appropriate to determine whether or not hazardous waste permits were required. Completion of that review process indicated that under the existing regulations CEI was not treating, storing or disposing of hazardous waste. The boiler cleaning wastes itemized on the Part A Application are currently excluded under 40 CFR 261.4(b)(4) and the interpretation of that Section outlined in the "Dietrich letter" provided by Mr. Gary N. Dietrich, former Associate Deputy Assistant Administrator of Solid Waste of USEPA. The demineralizer regenerant waste itemized on the Part A Application are currently excluded from regulation by virtue of treatment in elementary neutralization units (40 CFR 265.1(c)(10)).

CEI does not handle any other potentially hazardous waste for which a permit would be required for the treatment, storage or disposal of such waste.



<b>FORM 1</b> <b>GENERAL</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	<b>A.I.D. NUMBER</b> F O H D 0 0 0 7 7 2 7 6 4 3 D 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15
<b>LABEL ITEMS</b> I. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.
<b>PLEASE PLACE LABEL IN THIS SPACE</b>		

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	X			J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**

C 1	SKIP	ASHTABULA A - B ELECTRIC GENERATING PLANT	69
--------	------	---	----

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)				B. PHONE (area code & no.)			
C 2	KENNEDY, ALEXANDER J	216	998	3131		EXT. 26	

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX			
C 3	2133 LAKE ROAD		
B. CITY OR TOWN		C. STATE	D. ZIP CODE
C 4	ASHTABULA TOWNSHIP	OH	44004

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
C 5	2133 LAKE ROAD		
B. COUNTY NAME		C. CITY OR TOWN	D. STATE
C 6	ASHTABULA COUNTY	ASHTABULA TOWNSHIP	OH
		E. ZIP CODE	F. COUNTY CODE (if known)
		44004	007



## CONTINUED FROM THE FRONT

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND										
C	7	4	9	1	1	Generation, Transmission and distribution of electric energy for sale					C	7	(specify)							
15	16	17	18	19																
C. THIRD										D. FOURTH										
C	7	(specify)								C	7	(specify)								
15	16	17	18	19																

## VIII. OPERATOR INFORMATION

A. NAME																																																							B. Is the name listed in Item VIII-A also the owner?									
C	8	C	L	E	V	E	L	A	N	D	E	L	E	C	T	R	I	C	I	L	L	U	M	I	N	A	T	I	N	G	C	O	M	P	A	N	Y																										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
15	16																																												55	66																		
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																																													D. PHONE (area code & no.)																			
F = FEDERAL S = STATE P = PRIVATE															M = PUBLIC (other than federal or state) O = OTHER (specify)															(specify) Public Utility															C	A	2	1	6	6	2	2	9	8	0	0								
15	16																															55	15	16	17	18	19	20	21	22	23	24	25																					
E. STREET OR P.O. BOX																																																																
P. O. BOX 5000																																																																
25																																													55																			
F. CITY OR TOWN																																								G. STATE					H. ZIP CODE					IX. INDIAN LAND														
C	B	C	L	E	V	E	L	A	N	D																										O	H	4	4	1	0	1	Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																					
15	16																															40	41	42	43	44	45	46	47	48	49	50	51	52																				

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																
C	T	I	9	N											C	T	I	9	P												
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																
C	T	I	9	U											C	T	I	9											(specify)		
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																
C	T	I	9	R											C	T	I	9											(specify)		
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9 A/50

## XII. NATURE OF BUSINESS (provide a brief description)

Generation, Transmission and distribution of Electric Energy for Sale.

F9 A/51

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)																														B. SIGNATURE																				C. DATE SIGNED									
John W. Fenker, Vice President																														John W. Fenker																				11.17.80									

## COMMENTS FOR OFFICIAL USE ONLY

COMMENTS FOR OFFICIAL USE ONLY																																																						
C																																																						
15	16																																												55									



EPA Form 3510-3 (6-80)

NOV 18 1980



**III. PROCESSES (continued)**

**C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.**

Periodically, boiler tubes are chemically cleaned to remove scale deposits. This process may generate up to 68,000 gallons of liquid waste including the rinse. This waste is evaporated in the combustion chamber of the boiler. All requirements of part 265 subpart P are observed.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS . . . . .	P
TONS . . . . .	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS . . . . .	K
METRIC TONS . . . . .	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY																			
<div> <div>W O H D 0 0 0 7 7 2 7 6 4 3 1</div> <div>1 2 13 14 15</div> </div>															<div> <div>W DUP</div> <div>1 2 13 14 15 23 - 26</div> </div>																			
V. DESCRIPTION OF HAZARDOUS WASTES (continued)																																		
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																														
				<div> <div>1. PROCESS CODES (enter)</div> <div>2. PROCESS DESCRIPTION (if a code is not entered in D(1))</div> </div>																														
23	26	27	35	36	27	29	27	29	27	29	27	29																						
001	D 0 0 2	556 Tons/Yr. 556000	T	T 0 2 T 0 1									non-regulated - neutralization tank																					
002	D 0 0 7	282 Tons/Yr. 282000	T	T 0 4																														
003	D 0 0 8												Included with above																					
4																																		
5																																		
6																																		
7																																		
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## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	0	0	7	7	2	7	6	4	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). *FLA A/55*

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). *FLA FLA N/56*

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

4	1	3	2	0	0	8	0	8	0
65	66	67	68	69	70	71	72	73	74

LONGITUDE (degrees, minutes, &amp; seconds)

0	8	1	3	8	0	3	2	3	2
75	76	77	78	79	80	81	82	83	84

## VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

John W. Fenker, Vice President

B. SIGNATURE

*John W. Fenker*

C. DATE SIGNED

*11.17.80*

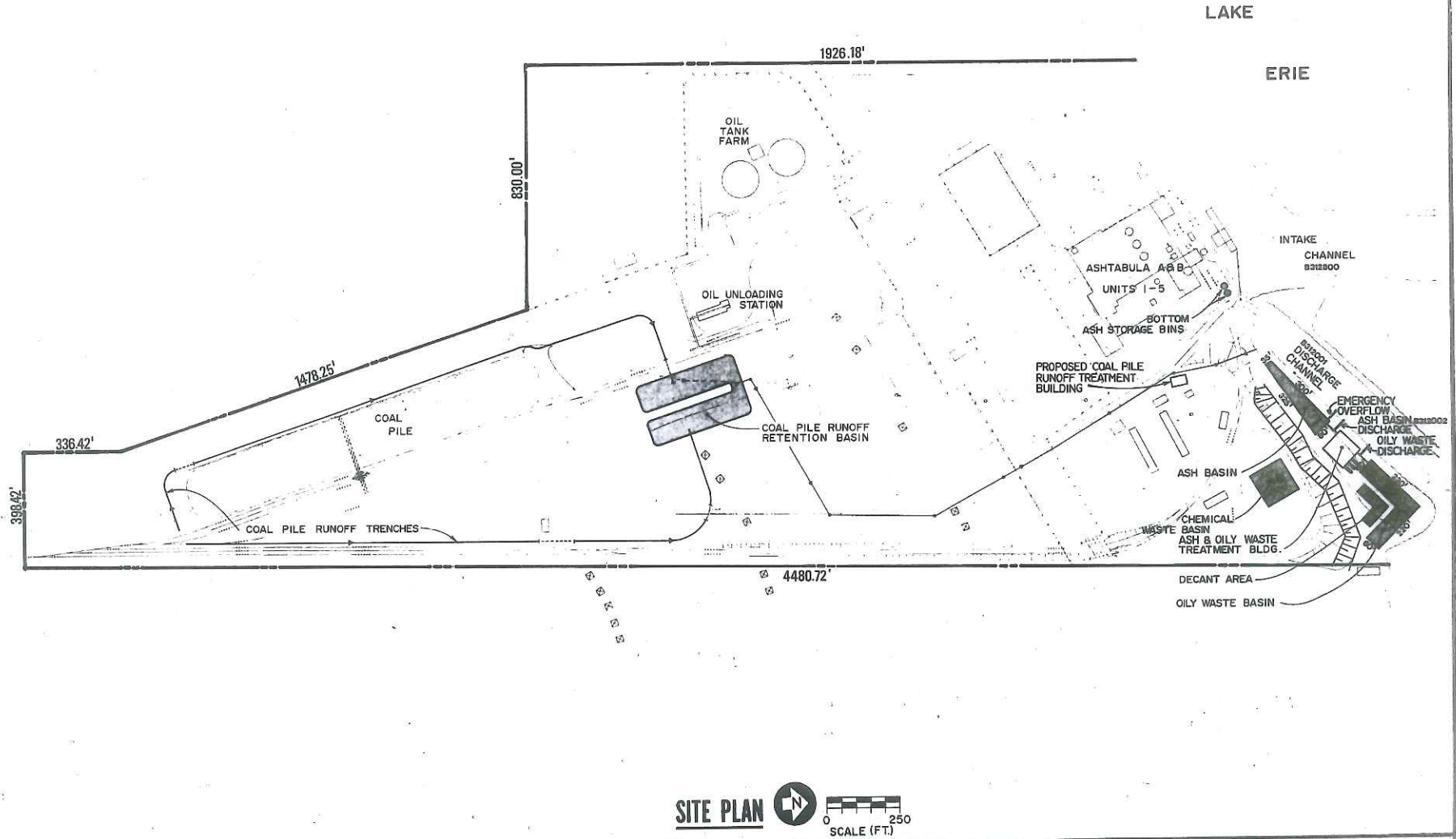
## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

# ASHTABULA A&B PLANT

*Handwritten signature/initials in red ink.*



A.4 Closure/  
Post-Closure



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 ■ CLEVELAND, OHIO 44101 ■ TELEPHONE (216) 622-9800 ■ ILLUMINATING BLDG. ■ 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

March 27, 1984

OH D 000 772 764 ✓

OH D 046 629 648

OH D 000 816 645

OH D 094 511 607

OH D 000 723 411

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, Illinois 60604

ATTENTION: RCRA Financial Requirements

Dear Mr. Golz:

The purposes of this letter are to confirm our discussion of March 26, 1984, and to reiterate The Cleveland Electric Illuminating Company's interpretation of 40 CFR Parts 264 and 265.

As you know, The Cleveland Electric Illuminating Company recently requested withdrawal of our Treatment, Storage, and Disposal permits for five generating stations. EPA granted the requests and the permits were formally withdrawn by five letters, each dated January 26, 1984. Please find copies of those letters attached for your files.

The Cleveland Electric Illuminating Company does not own or operate a hazardous waste treatment, storage, or disposal facility. Likewise, the Company does not own or operate a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste. As you know, 40 CFR Parts 264 and 265 set forth regulations governing owners and operators of hazardous waste treatment, storage, and disposal facilities. Each of those Parts contain Subparts setting forth financial requirements of owners and operators. As stated above, The Cleveland Electric Illuminating Company does not own or operate hazardous waste facilities and, therefore, it is now unnecessary, in our opinion, that The Cleveland Electric Illuminating Company submit financial data to EPA.

If you feel it necessary to discuss this matter further, please call me on extension 2340. Also, at your request, I am sending a copy of this letter without attachments to Ms. Deborah Tegtmeyer of OEPA.

Sincerely,

*Kenneth L. Mitchell*

Kenneth L. Mitchell  
Associate Counsel

KLM:ms

cc: R. Parker (w/enc.)  
L. Leonard (w/enc.)  
D. Tegtmeyer, OEPA (w/o enc.)

RECEIVED  
MAR 30 1984  
WASTE MANAGEMENT  
BRANCH



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

E. Lyle Pepin  
SECRETARY

March 31, 1983

RECEIVED  
MAR 05 1983  
WASTE MANAGEMENT  
BRANCH

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: RCRA Financial Requirements

Gentlemen:

Reference is made to my letter dated March 23, 1983 under which we submitted documents to evidence compliance with the Alternative II financial responsibility test pursuant to paragraph (f)(1)(ii) of 40 CFR 265.147.

Mention was made in that letter that the Form 10-K was then in process and would be forwarded to you.

Enclosed is the Company's 1982 Annual Report to the Securities and Exchange Commission (SEC) on Form 10-K, filed March 31, 1983 with the SEC.

Sincerely,

*E. Lyle Pepin*

E. Lyle Pepin  
Secretary

ELP:jl

Enclosure



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. — 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

E. Lyle Pepin  
SECRETARY

March 23, 1983

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
MAR 28 1983

WASTE MANAGEMENT  
BRANCH

Attention: RCRA Financial Requirements

Gentlemen:

The following documents are submitted herewith to establish that The Cleveland Electric Illuminating Company meets the Alternative II financial responsibility test pursuant to paragraph (f)(1)(ii) of 40 CFR 265.147:

1. The chief financial officer's letter to demonstrate the Company's financial responsibility for liability coverage and closure;
2. One copy of the Company's 1982 Annual Report to Share Owners containing a copy of Price Waterhouse's report on page 24; and
3. Price Waterhouse's special report pertaining to financial data contained in the chief financial officer's letter.

The Company's 1982 Annual Report to the Securities and Exchange Commission (SEC) on Form 10-K, which will contain a copy of Price Waterhouse's report, has not yet been completed. It will be filed with the SEC on March 31. A copy will be forwarded to you on April 1, 1983.

In the event that you should have any questions regarding this submittal, please contact me by telephone at (216) 622-9800, Extension 6532.

Sincerely,

E. Lyle Pepin  
Secretary

ELP:k1  
Enclosures





1900 CENTRAL NATIONAL BANK BUILDING  
CLEVELAND, OH 44114  
216 781-3700

March 23, 1983

To the Board of Directors of  
The Cleveland Electric Illuminating Company

We have examined the consolidated balance sheet of The Cleveland Electric Illuminating Company and its subsidiaries as of December 31, 1982, and the related consolidated statements of income, capitalization, retained earnings, and changes in financial position for the year then ended, and have issued our report thereon dated February 4, 1983. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We obtained an analysis prepared by the Company which derived "tangible net worth" at December 31, 1982, as specified in subpart H of 40 CFR part 264.141, from the 1982 audited consolidated financial statements. We ascertained that the Company's analysis was mathematically correct, compared the computed amount of tangible net worth of \$1,644,166,000 on the Company's analysis with the amount appearing under Item 7 on page 3 of the Company's March 23, 1983 letter to the Environmental Protection Agency and found them to be in agreement.

In connection with the above procedure, nothing came to our attention that caused us to believe that tangible net worth should be adjusted.

*Price Waterhouse*





# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 ■ CLEVELAND, OHIO 44101 ■ TELEPHONE (216) 622-9800 ■ ILLUMINATING BLDG. ■ 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

Edgar H. Maugans  
VICE PRESIDENT-FINANCE

March 23, 1983

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, IL 60604

Attention RCRA Financial Requirements

Gentlemen:

I am the chief financial officer of The Cleveland Electric Illuminating Company, the Illuminating Building, 55 Public Square, P.O. Box 5000, Cleveland, Ohio 44101. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

## EPA Identification

<u>Number</u>	<u>Name</u>	<u>Address</u>
OHD000772764	Ashtabula A-B Electric Generating Plant	2133 Lake Road Ashtabula Township, Ohio 44004
OHD000816645	Ashtabula C Plant	2715 Lake Road Ashtabula Township, Ohio 44004
OHD046629648	Avon Lake Plant	33570 Lake Road Avon Lake, Ohio 44012
OHD094511607	Eastlake Electric Generating Plant	10 Erie Road Eastlake, Ohio 44094
OHD000723411	Lake Shore Plant	6800 South Marginal Drive Cleveland, Ohio 44103

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>EPA Identification Number</u>	<u>Name</u>	<u>Address</u>	<u>Estimated Closure Cost</u>
OHD000772764	Ashtabula A-B Electric Generating Plant	2183 Lake Road Ashtabula Township, Ohio 44004	\$1,000
OHD000816645	Ashtabula C Plant	2715 Lake Road Ashtabula Township, Ohio 44004	1,000
OHD046629648	Avon Lake Plant	33570 Lake Road Avon Lake, Ohio 44012	1,000
OHD094511607	Eastlake Electric Generating Plant	10 Erie Road Eastlake, Ohio 44094	1,000
OHD000723411	Lake Shore Plant	6800 South Marginal Drive Cleveland, Ohio 44103	1,000

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

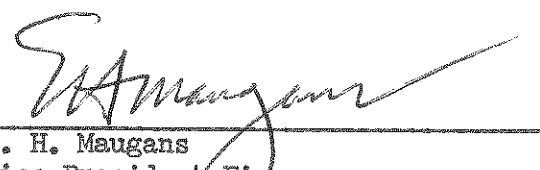
This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

Part B., Alternative II

- |  |          |                         |
|--|----------|-------------------------|
| 1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above) | \$       | <u>5,000</u>            |
| 2. Amount of annual aggregate liability coverage to be demonstrated                                  | \$       | <u>2,000,000</u>        |
| 3. Sum of Lines 1 and 2  | \$       | <u>2,005,000</u>        |
| 4. Current bond ratings of most recent issuance and name of rating service                           |          | <u>A2 (Moody's)</u>     |
| 5. Date of issuance of bond  |          | <u>December 1, 1982</u> |
| 6. Date of maturity of bond  |          | <u>December 1, 2012</u> |
| *7. Tangible net worth   | \$       | <u>1,644,166,000</u>    |
| *8. Total assets in the U.S.   |          | <u>Not required</u>     |
|  | Yes      | No                      |
| 9. Is Line 7 at least \$10 million?  | <u>X</u> | <u>      </u>           |
| 10. Is Line 7 at least 6 times Line 3?   | <u>X</u> | <u>      </u>           |
| *11. Are at least 90% of assets located in the U.S.?"  | <u>X</u> | <u>      </u>           |
| 12. Is Line 8 at least 6 times Line 3?   |          | <u>Not required</u>     |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
E. H. Maugans  
Vice President-Finance  
March 23, 1983



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 ■ CLEVELAND, OHIO 44101 ■ TELEPHONE (216) 622-9800 ■ ILLUMINATING BLDG. ■ 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

Andrew R. Felmer  
SECRETARY

June 30, 1982

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, IL 60604

Attention RCRA Financial Requirements

Gentlemen:

The following documents are submitted herewith to establish that The Cleveland Electric Illuminating Company meets the Alternative II financial responsibility test pursuant to paragraph (f)(1)(ii) of 40 CFR 265.147:

1. The chief financial officer's letter to demonstrate the Company's financial responsibility for liability coverage and closure;
2. One copy each of the Company's 1981 Annual Report to Share Owners and Annual Report to the Securities and Exchange Commission on Form 10-K, each containing a copy of Price Waterhouse's report on page 24 and 32, respectively; and
3. Price Waterhouse's special report pertaining to financial data contained in the chief financial officer's letter.

In the event that you should have any questions regarding this submittal, please contact me by telephone at (216) 622-9800, Extension 6516.

Sincerely,

A. R. Felmer  
Secretary

ARF:jl  
Enclosures



1900 CENTRAL NATIONAL BANK BUILDING  
CLEVELAND, OH 44114  
216 781-3700

June 30, 1982

To the Board of Directors of  
The Cleveland Electric Illuminating Company

We have examined the consolidated balance sheet and the consolidated statement of capitalization of The Cleveland Electric Illuminating Company and its subsidiaries as of December 31, 1981, and the related consolidated statements of income, retained earnings, and changes in financial position for the year then ended, and have issued our report thereon dated February 12, 1982. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records as we considered necessary in the circumstances.

We obtained an analysis prepared by the Company which derived "tangible net worth" at December 31, 1981, as specified in subpart H of 40 CFR part 264.141, from the 1981 audited consolidated financial statements. We ascertained that the Company's analysis was mathematically correct, compared the computed amount of tangible net worth of \$1,425,277,000 on the Company's analysis with the amount appearing under Item 7 on page 3 of the Company's June 30, 1982 letter to the Environmental Protection Agency and found them to be in agreement.

In connection with the above procedure, nothing came to our attention that caused us to believe that tangible net worth should be adjusted.

*Price Waterhouse*





# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 ■ CLEVELAND, OHIO 44101 ■ TELEPHONE (216) 622-9800 ■ ILLUMINATING BLDG. ■ 55 PUBLIC SQUARE

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Edgar H. Maugans  
VICE PRESIDENT-FINANCE

June 30, 1982

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, IL 60604

Attention RCRA Financial Requirements

Gentlemen:

I am the chief financial officer of The Cleveland Electric Illuminating Company, The Illuminating Building, 55 Public Square, P.O. Box 5000, Cleveland, Ohio 44101. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA Identification

<u>Number</u>	<u>Name</u>	<u>Address</u>
OHD000772764	Ashtabula A-B Electric Generating Plant	2133 Lake Road Ashtabula Township, Ohio 44004
OHD000816645	Ashtabula C Plant	2715 Lake Road Ashtabula Township, Ohio 44004
OHD046629648	Avon Lake Plant	33570 Lake Road Avon Lake, Ohio 44012
<sup>not in Log</sup> OHD094511607	Eastlake Electric Generating Plant	10 Erie Road Eastlake, Ohio 44094
OHD000723411	Lake Shore Plant	6800 South Marginal Drive Cleveland, Ohio 44103

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

**C.2 Compliance/  
Enforcement**

Re: DHMM  
C.E.I. - Ashtabula 'A & B' Plant  
Permit No. 02-04-0268

Mr. Kennedy  
C.E.I. - Ashtabula 'A & B'  
2133 Lake Road  
Ashtabula, Ohio 44004

August 26, 1982

Dear Mr. Kennedy:

Thank you for the courtesy extended during my August 9, 1982, inspection of the C.E.I. - Ashtabula 'A & B' Plant. You, Paul Kowalski, and Doug Rider represented C.E.I. during the inspection. This letter is intended to summarize the inspection.

During our meeting, you explained that some spent solvents are generated at the plant which are not currently being handled as hazardous wastes. As per my August 11, 1982, phone conversation with Doug Rider, the solvents may be Stoddard solvent and 1,1,1 trichloroethane. Please provide documentation as to the chemical composition and nature of the spent solvents. Also indicate the quantity of spent solvents generated over the past year on a monthly basis.

Regarding any emissions from the "treatment" operation, please describe the anticipated products of combustion of the spent boiler cleaning solution. In addition, please indicate which compounds are expected to pass through the air pollution control equipment and be emitted from the stack.

We also discussed the ash generated from the treatment of the spent cleaning solution. This ash is not currently being handled as a hazardous waste as 40 CFR 261.3 (c) and OAC 3745-51-03 (C) requires. In order to continue handling the "treatment" ash as non-hazardous, the EP Toxicity determination will have to be made as per 40 CFR 261.3 (d) and OAC 3745-51-03 (D).

Enclosed with this letter is a copy of the inspection report pertaining to the Ashtabula 'A & B' facility. The following problems were noted during the inspection:

- (1) Contingency Plan had not been sent to local authorities as per OAC 3745-54-53 (B) and 40 CFR 265.53 (b);
- (2) Contingency Plan did not include a complete listing of any safety and emergency equipment (location and description) which may be used in the case of an accident involving hazardous waste as per OAC 3745-54-52 (E) and 40 CFR 265.52 (e);
- (3) Auxiliary equipment such as pumps and piping was not addressed in the Closure Plan as required by OAC 3745-56-03 or 40 CFR 265.112;

Mr. Kennedy  
C.E.I. - Ashtabula 'A & B'  
August 26, 1982  
Page Two

- (4) Inspections of the waste storage tanks were not documented as per OAC 3745-54-15 (D) and 40 CFR 265.15 (d);
- (5) Unable to verify maintenance of safety or emergency equipment as per OAC 3745-54-33 and 40 CFR 265.33; and
- (6) Safety and emergency equipment maintenance was not addressed in the Inspection Schedule as required by OAC 3745-54-15 (B)(1) and 40 CFR 265.15 (b)(1).

Please provide the ash and solvent information as soon as possible. The above listed problems should be corrected within thirty (30) days of receipt of this letter. Please notify the Agency in writing when compliance is achieved. Copies of the revised plans should be submitted to verify compliance.

A copy of this report is being forwarded to Ms. Kathy Homer, U.S. EPA, Region V, at 230 S. Dearborn Street, Chicago, Illinois 60604. Please call me at (216) 425-9171 or Ms. Homer at (312) 886-7435 if you have any questions.

Yours truly,

Christine M. Frazier  
Environmental Scientist  
Division of Hazardous Materials Management

CMF:c11

Enclosure

cc: Ms. Paula Cotter, Div. of Hazardous Materials Management, Central Office  
Ms. Kathy Homer, U.S. EPA, Region V



# RCRA Inspection Report

EPA Identification Number OH 0000772764

HWFAB Permit Number (if appropriate) 02-04-0267

Facility Name CEL - ASHTABULA "A+B" PLANT

Location 2133 LAKE RD

ASHTABULA, Ohio 44004

Person(s) Interviewed

Title

Telephone

DUG RIDER

ENVIRONMENTAL ENGINEER

(216) 622-9800

PAUL KOVALSKI

ENVIRONMENTAL ENGINEER

(216) 998-3131

Inspector(s)

Agency/Title

Telephone

CHRIS FRAZIER

Ohio EPA ENVIRONMENTAL SCIENTIST (216) 425-9171

\_\_\_\_\_

Ohio EPA \_\_\_\_\_

\_\_\_\_\_

Ohio EPA \_\_\_\_\_

## Installation Activity

Mark One

☐ Generator only (G)

☐ Transporter only (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☐ Waste Piles S03

☐ Land Treatment D81

☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting

☐ Groundwater Monitoring

☒ Closure and Post-Closure

☒ Financial Requirements

☐ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☒ Incineration/Thermal Treatment T03

☐ Chemical/Physical/Biological T04

#### COMMENTS

- #1 - Spent boiler cleaning solution has been routinely tested, but the ash generated specifically from the "treatment" operation has not been analyzed. The ash is not being handled as a hazardous waste.
- #2 - Tank inspections are performed but not documented.
- #3 - Unable to verify maintenance and testing of safety and emergency equipment. Safety and emergency equipment not addressed in Inspection Schedule.
- #4 - Closure Plan should also address auxiliary equipment such as pumps and piping.

## PART 1. GENERAL INFORMATION

Facility: CEI - ASHTABULA "A+B" PLANT Address: 2133 LAKE RD City: ASHTABULA  
State: OHIO Zip Code: 44004 County: ASHTABULA Telephone: (216) 998-3131  
Facility Operator: CEI Co Title: CONTACT: PAUL KOWALSKI ENVIRONMENTAL ENGINEER Telephone: (216) 998-3131  
Facility Owner: SAME Address: \_\_\_\_\_ Telephone: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Type of Ownership: X PUBLIC Government State HWFAB No. 02-C41-0267  
Date of Inspection: 8/9/82 Time of Inspection: (Start) 1:00 (Finish) 3:15  
Advance Notification? No X Yes: \_\_\_\_\_  
Weather Conditions: SUNNY, ~80°

## INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>PAUL KOWALSKI</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(216) 998-3131</u>
2.	<u>Doug Rider</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(216) 422-9200</u>
3.	_____	_____	_____
4.	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

## INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	CHRIS FRAZIER	ENVIRONMENTAL SCIENTIST II	(311) 435-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☐ Storage C. ☒ Treatment  
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

b) Non-Listed Wastes: ☐ I ☐ C ☐ R ☐ T  
☐ D001 ☐ D002 ☐ D003 ☐ D000  
 \_\_\_\_\_  
 D007, D008  
 \_\_\_\_\_  
 \_\_\_\_\_

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

\_\_\_\_\_ Yes, See Remark # \_\_\_\_\_ ☒ No



RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

\_\_\_\_\_ Yes, See Remark # \_\_\_\_\_ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

\_\_\_\_\_ Yes, Complete Part 3 (Transp.) X No

a) Applicable U.S. EPA I.D. Number \_\_\_\_\_

b) Ohio P.U.C.O. GR TRSF Number \_\_\_\_\_

7. A brief description of site activity:

REMARKS, PART 1. (GENERAL INFORMATION)

# RCRA INTERIM STATUS INSPECTION FORM

## PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>      </u>	<u>      </u>	<u>      </u>	<u>#1</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u>      </u>	<u>X</u>	<u>      </u>	<u>      </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>      </u>	<u>X</u>	<u>      </u>	<u>      </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u>      </u>	<u>      </u>	<u>X</u>	<u>NO MANIFESTS HAVE BEEN GENERATED</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	_____	_____	<u>X</u>	_____
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	_____	_____	<u>X</u>	_____
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	_____	_____	<u>X</u>	_____
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<u>X</u>	_____	_____	_____
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<u>X</u>	_____	_____	_____
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	_____	_____	<u>X</u>	_____
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	_____	_____	_____	_____
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>X</u>	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	<u>X</u>	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	_____	_____	<u>X</u>	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-8 and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u>X</u>	_____	_____	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>X</u>	TANKS ARE COVERED.
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	_____	_____	_____	#2
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	_____	_____	_____	#2
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u>X</u>	_____	_____	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u>X</u>	_____	_____	_____



# RCRA INTERIM STATUS INSPECTION FORM

## PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention  
D: Contingency and Emergency

E: Manifest/Records/Reporting  
F: Ground Water Monitoring  
G: Closure

H: Financial Requirements

### Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	<u>      </u>	<u>      </u>	SPENT BOILER CLEANING SOLUTION
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
a) 24-hour surveillance system.	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	---	---	---	INCOMPLETE WITH REGARD TO SECURITY AND EMERGENCY EQUIPMENT
a) Inspect emergency equipment.	---	X	---	#3
b) Inspect monitoring equipment.	X	---	---	
c) Inspect security, alarm and communication devices.	---	X	---	#3
d) Inspect process equipment (pipes, pumps, etc.).	X	---	---	
e) Inspect containment structures (dikes, curbs, etc.).	X	---	---	
f) Inspect facility for structural malfunctions (roof, floor, etc.).	---	---	X	
g) Inspect hazardous waste handling/loading areas each day used.	X	---	---	
h) Record of any malfunctions due to equipment or operator errors.	X	---	---	
i) Record of any hazardous waste discharges.	X	---	---	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	X	---	---	
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	X	---	---	
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).				

# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u>    |
|---|------------|-----------|------------|--------------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).   | <u>X</u>   | _____     | _____      | PHITS<br>ABSORBANT |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <u>X</u>   | _____     | _____      | _____              |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).   | _____      | _____     | <u>X</u>   | _____              |

## Subpart D: Contingency and Emergency

- |  |          |          |       |   |
|--|----------|----------|-------|---|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:  | <u>X</u> | _____    | _____ | _____   |
| a) Actions to be taken by personnel in the event of an emergency incident.   | <u>X</u> | _____    | _____ | _____   |
| b) Arrangements or agreements with local or state emergency authorities.   | <u>X</u> | _____    | _____ | _____   |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.  | <u>X</u> | _____    | _____ | _____   |
| d) A list of all emergency equipment including location, physical description and outline of capabilities.   | _____    | <u>X</u> | _____ | LIST INCOMPLETE   |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).  | _____    | <u>X</u> | _____ | COMPANY FEELS THAT<br>EVACUATION PLAN IS<br>UNNECESSARY |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | _____    | <u>X</u> | _____ | NOT YET SENT TO<br>LOCAL AUTHORITIES                    |



RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).  | <u>X</u>   | ___       | ___        | ___             |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55). | <u>X</u>   | ___       | ___        | ___             |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.           | ___        | ___       | <u>X</u>   | ___             |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).				
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).				
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.				

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u>X</u>			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).	<u>X</u>			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u>X</u>			
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u>X</u>			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<u>X</u>			

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>
b) Physical separation of incompatible waste materials.	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>

# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark#</u>                  |
|---|------------|-----------|------------|---------------------------------|
| e) The present physical location of each hazardous waste within the facility.   | <u>X</u>   | ___       | ___        | ___                             |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2). | ___        | ___       | <u>X</u>   | ___                             |
| g) Records of any waste analyses and trial tests required to be performed.  | <u>X</u>   | ___       | ___        | MAINTAINED AT THE CLEVELAND LAB |
| h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).  | <u>X</u>   | ___       | ___        | ___                             |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.   | <u>X</u>   | ___       | ___        | ___                             |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.  | <u>X</u>   | ___       | ___        | ___                             |
| 2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.                                   | <u>X</u>   | ___       | ___        | ___                             |

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).

\_\_\_ \_\_\_ X \_\_\_

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).

\_\_\_ \_\_\_ X \_\_\_



# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>X</u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<u>X</u>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>X</u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>X</u>	_____

## Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	<u>X</u>	_____

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>X</u>	—	—	—
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>X</u>	—	—	—
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>X</u>	—	—	—
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>X</u>	—	—	—
d) A description of steps taken to decontaminate facility equipment.	—	—	—	<u>11-21</u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	—	—	<u>X</u>	—
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	—	—	<u>X</u>	—

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.

\_\_\_\_\_   \_\_\_\_\_   X   \_\_\_\_\_

c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.

\_\_\_\_\_

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	_____	_____	<u>X</u>	_____
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	_____	_____	<u>X</u>	_____
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	_____	_____	<u>X</u>	_____
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	_____	_____	<u>X</u>	_____
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	_____	_____	<u>X</u>	_____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	_____	_____	<u>X</u>	_____
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	_____	_____	<u>X</u>	_____
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	_____	_____	<u>X</u>	_____
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	_____	_____	<u>X</u>	_____



RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | _____      | _____     | <u>X</u>   | _____           |

Subpart H: Financial Requirements

- |  |          |       |       |       |
|--|----------|-------|-------|-------|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | <u>X</u> | _____ | _____ | _____ |
|--|----------|-------|-------|-------|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS






- |   |  |   |         |
|---|--|---|---------|
| X |  |   |         |
|   |  | X | COVERED |
|   |  |   | #2      |
|   |  |   | #2      |
|   |  | X |         |
|   |  | X |         |
|   |  | X |         |

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	—	—	<u>X</u>	—
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	—	—	<u>X</u>	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	—	—	<u>X</u>	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	—	—	<u>X</u>	—
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	—	—	<u>X</u>	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	<u>X</u>	—	—	TANKS ARE RINSED

Subparts O and P: Incineration and Thermal Treatment

1. Determination of Steady State

a) Type of unit (i.e., type of incinerator or thermal treatment):

COAL BOILER

b) Components and steady state condition:

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE.

<u>Component</u>		<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1.	<u>AIR FLOW</u>	<u>X</u>	---	---	---
2.	<u>TEMPERATURE</u>	<u>X</u>	---	---	---
3.	<u>COAL FEED</u>	<u>X</u>	---	---	---
4.	_____	---	---	---	---



RCRA INTERIM STATUS INSPECTION FORM

2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Required analyses; has an analysis been performed for the heating value?	_____	_____	<u>X</u>	_____
b) Halogen content?	_____	_____	<u>X</u>	_____
c) Sulfur content?	_____	_____	<u>X</u>	_____
d) Has documented or written data been substituted for analysis of either:				
1. Lead?	<u>X</u>	_____	_____	DATA PROVIDED BUT NOT REQUIRED BY REGULATION ↓
2. Mercury?	<u>X</u>	_____	_____	
e) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				

	<u>Remark #</u>
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____

# RCRA INTERIM STATUS INSPECTION FORM

## 3. Monitoring and Inspections

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Are combustion/emission control instruments monitored at least every 15 minutes?	<u>X</u>	_____	_____	_____
b) Is steady state maintained or corrections attempted?	<u>X</u>	_____	_____	_____
c) Is tack plume observed at least hourly for normal color and opacity?	<u>X</u>	_____	_____	_____
d) Did any stack observations made by owner or operator show a plume different than normal?	_____	<u>X</u>	_____	_____
e) If yes to "d" above, were corrections made to return emissions to normal appearance?	_____	_____	<u>X</u>	_____

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	<u>X</u>	_____	_____	_____
g) Are emergency shutdown controls and system alarms checked daily for proper operation?	<u>X</u>	_____	_____	_____

## 4. Open Burning

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

a) Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	<u>X</u>	_____
b) If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	<u>X</u>	_____

Re: Application Number 81-HW-0267  
Ashtabula County

September 4, 1981

Alexander Kennedy  
Cleveland Electric Illuminating Co.  
Ashtabula A-B Plant  
2133 Lake Road  
Ashtabula Township, Ohio 44004

Dear Mr. Kennedy:

On July 15, 1981, Garry Gifford of the Ohio EPA conducted an inspection of your facility as part of the Hazardous Waste facility permit review process. Your facility was represented by Robert Wykoff.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

*Paul Flanigan*

Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, USEPA, Region V  
Gary Gifford, NEDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE  
ISS INSPECTION

FACILITY NO. - *8/- HW-0267*  
 OWNER - *Cleveland Electric Illumination Co.*  
 FACILITY NAME - *Ashtabula A-B Electric Gen. Plt.*  
 FACILITY LOCATION - *2133 Lake Rd., Ashtabula, Ohio 44004*  
 FACILITY CONTACT - *Alexander Kennedy*  
 ISS INSPECTION DATE - *7/15/81*

PHONE NO. - *(216) 998-3131*  
*Ext. 26*

	COLUMN I	COLUMN II	COLUMN III	COLUMN IV	COLUMN V	COLUMN VI
Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"	B	✓	
	5	"	"	B	✓	
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"	B	✓	
	F 1	3745-55-17	265.17	B		
5	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52	B	✓	
	3	"	"			
	4	"	"			
	5	"	"	B	✓	
7	B 1	3745-55-53	265.53	C		
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
	VI A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"	B		
9	VII A 1	3745-56-03	265.112	B	✓	
	2	"	"	B	✓	
	3	"	"			
	4	3745-56-32	265.142	B	✓	
	B 1	3745-56-09	265.118	B	✓	
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265.192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265.193			
	5	3745-56-74	265.194	B	✓	
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			



Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use			
12	L	1	3745-57-31	265.251					
		2	3745-57-32	265.252					
		3		265.258					
		4	3745-57-36	265.256					
		5	"	"					
		6	3745-57-37	265.257					
		7	3745-57-37	265.257					
13	M	1	3745-57-52	265.272					
		2	"	"					
		3	3745-57-53	265.273					
		4	3745-57-56	265.276					
		5	3745-57-58	265.278					
		6	3745-57-58	265.278					
		7	3745-57-59	265.279					
		8	3745-57-61	265.281					
		9	3745-57-62	265.282					
14	N	A	1	3745-57-72	265.302				
			2	"	"				
			3	"	"				
			4	"	"				
	B	1	3745-57-79	265.309					
			2	"	"				
	C	1	3745-56-03	265.112					
			2	"	"				
			3	"	"				
	D	1	3745-56-32	265.192					
			3745-57-82	265.312					
			3745-55-17	265.17(b)					
15	E	1	3745-57-83	265.313					
			3745-55-17	265.17(b)					
	F	1	3745-57-84	265.314					
			2	"	"				
			3	"	"				
	G	1	3745-57-85	265.315					
16	I	B	1	3745-58-33	265.373				
			2	"	"				
			3	"	"				
			4	"	"				
			5	"	"				
	II	A	1a	3745-58-35	265.375				
			b	"	"				
			c	"	"				
			17			2a	3745-58-35	265.375	
						b	"	"	
B	1	"	"						
		2	"	"					
		3	"	"					
		4	"	"					
		5	"	"					

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEP Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	<del>3745-58-42</del>	<del>262.42</del>			
	(C)	3745-52-42	262.42			
	2. (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

STATE IDENTIFICATION NUMBER

BT-HW- 0267

EPA IDENTIFICATION NUMBER

OH0000772764

TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: AshTabula A-B Electric generating plant  
(B) Street: 2133 Lake Road  
(C) City: AshTabula (D) State: Ohio (E) Zip Code: 44004  
(F) Phone: (216)998-3131 (G) County: AshTabula  
(H) Operator: Cleveland Electric Illuminating Company  
(I) Street: 2133 Lake Road  
(J) City: AshTabula (K) State: Ohio (L) Zip Code: 44004  
(M) Phone: (216)998-3131 (N) County: AshTabula  
(O) Owner: Cleveland Electric Illuminating Company  
(P) Street: P.O. Box 5000  
(Q) City: Cleveland (R) State: Ohio (S) Zip Code: 44101  
(T) Phone: (216)622-9800 (U) County: Cuyahoga  
(V) Date of Inspection: 7-15-81 (W) Time of Inspection (From) 9 AM (To) 2 PM  
(X) Weather Conditions: clear, sunny, warm

(Y) Person(s) Interviewed	Title	Telephone
<u>A. Kennedy</u>	<u>plant manager</u>	<u>216 998 3131</u>
<u>R. Wysocki</u>	<u>chemical engineer</u>	<u>216 622 9800</u>
<u>S. Washington</u>	<u>RCRA coordinator</u>	<u>"</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>above</u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
(AA) Preparer Information		
Name <u>Larry D. Dillard</u>	Agency/Title <u>OEPA / Env. Scientist</u>	Telephone <u>216 425 9171</u>

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |  |  |
|--|--|
| <p><u>  </u> A. Storage and/or Treatment <span style="float: right;">N/A</span></p> <p>    1. Containers (I)</p> <p>    2. Tanks (J)</p> <p>    3. Surface Impoundments (K)</p> <p>    4. Waste Piles (L)</p> <p><u>  </u> B. Land Treatment (M)</p> <p><u>  </u> C. Landfills (N)</p> | <p><input checked="" type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><u>  </u> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|--|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.



A-B

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Facility expansion?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>information filed at central lab, not in plant</i>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>N/A</i>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>entire plant monitored</i>
2. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>24 hours, all entry through <del>entrance</del> controlled</i>
3. Controlled entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>gates</i>
4. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>during unit cleaning - area roped &amp; flagged</i>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>separate log on</i>
2. Records of operator error?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>unusual events</i>
3. Records of discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>operations log</i>

\*Not Inspected

### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	continuous monitoring <sup>personal</sup>
5. Safety, emergency equipment?	---	✓	(A)---	no special equipment beyond manual plant safety equip
6. Security devices?	---	---	✓---	see #4
7. Operating and structural devices?	✓	---	---	inspected before & after unit cleaning
8. Inspection log?	✓	---	---	comments logged in operation log
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	1, 2, 4 - on the job & new
2. Job descriptions?	✓	---	---	training programs
3. Description of training?	---	✓	---	3, 5, 6 plant developing
4. Records of training?	✓	---	---	new training pgm -
5. Have facility personnel received required training by 5-19-81?	---	✓	(B)---	will be complete prior to next cleaning
6. Do new personnel receive required training within six months?	---	✓	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	(C)---	probably not required
2. No smoking signs?	✓	---	---	for cleaning wastes
3. Separation and protection from ignition sources?	✓	---	---	

\*Not Inspected

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI\* Remarks

\_\_\_\_\_ ✓ \_\_\_\_\_ no cleaning underway during inspection

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

✓ \_\_\_\_\_ \_\_\_\_\_

2. Telephone or 2-way radios at the scene of operations?

✓ \_\_\_\_\_ walkie-talkie system

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (✓)

✓ \_\_\_\_\_ ① portable units for each type of device

Indicate the volume of water and/or foam available for fire control:

foam - portable units + hand held units -  
plant files include volume info  
water - throughout plant (diesel driven fire pump available)

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ \_\_\_\_\_ \_\_\_\_\_

2. Is emergency equipment maintained in operable conditions?

✓ \_\_\_\_\_ \_\_\_\_\_

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓ \_\_\_\_\_ through control room + P. A. system

- (E) Is there adequate aisle space for unobstructed movement? ✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

- (A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓              

✓ update frequency

last indicated SPCC  
revision was 1974

       ✓ ⓔ

✓              

✓              

most  
equipment is portable

       ✓       

plant does not see any  
need for general  
evacuation

\*Not Inspected

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

Yes No NI\* Remarks

- (B) Are copies of the Contingency Plan available at site and local emergency organizations?

☒ ☒ ☐ (F)

## (C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?
2. Is coordinator familiar with all aspects of site operation and emergency procedures?
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒ ☐ ☐

☒ ☐ ☐

☒ ☐ ☐

## (D) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☒ ☐ ☐

*no emergency to date*

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

Yes No NI\* Remarks

### (A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each manifest?
2. Are records of past shipments retained for 3 years?

☐ ☐ ☐

☐ ☐ ☐

*N/A no wastes received or sent off-site*

- (B) Does the owner or operator meet requirements regarding manifest discrepancies?

☐ ☐ ☐



VI. RECORDKEEPING - Continued

(G)

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

c. The location and quantity of each hazardous waste within the facility?

✓

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

f. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

g. All closure and post closure costs as applicable? (Effective 5-19-81)

(H)

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				(H)
1. Is the facility closure plan available for inspection by May 19, 1981?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator	_____	_____	_____	_____
3. Has closure begun?	_____	_____	_____	_____
4. Is closure estimate available by May 19, 1981?	_____	_____	_____	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	_____	_____	_____	_____

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are containers in good condition?	_____	_____	_____	_____
2. Are containers compatible with waste in them?	_____	_____	_____	_____
3. Are containers stored closed?	_____	_____	_____	_____
4. Are containers managed to prevent leaks?	_____	_____	_____	_____
5. Are containers inspected weekly for leaks and defects?	_____	_____	_____	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	_____	_____	_____	_____

Yes No NI\* Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

\_\_\_\_\_

J  
TANKS

Facility Name: CEI Ash A+B

Date of Inspection: 7-15-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

\_\_\_\_\_

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

\_\_\_\_\_

3. Do continuous feed systems have a waste-feed cutoff?

\_\_\_\_\_

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

\_\_\_\_\_

5. Are required daily and weekly inspections done?

\_\_\_\_\_

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

\_\_\_\_\_

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_

\*Not Inspected

L  
WASTE PILES

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

\*Not Inspected

Yes No NI\* Remarks

N/A

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS

Facility Name: CEI Ash A-B

Date of Inspection: 7-15-81

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

✓ \_\_\_\_\_

2. Do earthen dikes have protective covers?

✓ \_\_\_\_\_ no actual dikes - pit style ponds are lined

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

✓ \_\_\_\_\_ (J)

4. Is the freeboard level inspected at least daily?

✓ \_\_\_\_\_

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

✓ \_\_\_\_\_ each shift performs some checks

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

\_\_\_\_\_ N/A

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_ N/A



M  
LAND TREATMENT

W/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Is treated hazardous waste capable of biological or chemical degradation?

-----

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

-----

3. Is waste analyzed according to 265.273?

-----

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

-----

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

-----

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

-----

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

-----

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

-----

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

-----

N  
LANDFILLS

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
<b>(A) General Operating Requirements</b>				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	_____
**2. Collection of run-off from active portions of the fill?	---	---	---	_____
**3. Is collected run off treated?	---	---	---	_____
4. Control of wind dispersal of hazardous waste?	---	---	---	_____
( **Effective 11-19-81 )				
<b>(B) Surveying and Recordkeeping</b>				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	_____
<b>(C) Closure and Post-Closure</b>				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	_____
2. Has this plan been submitted to the Regional Administrator?	---	---	---	_____
3. Has closure begun?	---	---	---	_____
4. Is closure cost estimate available by 5-19-81?	---	---	---	_____
<b>(D) Special requirements for ignitable or reactive waste</b>				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P  
INCINERATION and THERMAL TREATMENT

(A) Facility Name: CET Ash A+B

(B) Date of Inspection: 7-15-81

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): operating batch  
furnace used to evaporate waste

B. Components and steady state condition: (K)

\*\*\*\* Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated. (L)

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

\*Not Inspected

	Yes	No	NI*	Remark
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____
3. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				Remarks
1. _____				_____
2. _____				_____
3. _____				_____
4. _____				_____
5. _____				_____

### III. Monitoring and Inspections

(L)

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

\*Not Inspected

\*\*Specify in Remarks for what period of time this was checked.

#### IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	N/A
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

#### CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	—	



	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal. *MA*

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	_____	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	_____	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	_____	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	_____	_____	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	_____	_____	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	_____	_____	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	_____	_____	_____	_____
7. Required certification?	_____	_____	_____	_____
8. Required signatures?	_____	_____	_____	_____
(C) Does the owner or operator submit exception reports when needed?	_____	_____	_____	_____

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	_____	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	_____	_____	_____	_____
(C) If required, are placards available to transporters of hazardous waste?	_____	_____	_____	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	_____	_____	_____	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	_____	_____	_____	_____

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?

\_\_\_\_\_

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
  - a. Notified the Administrator in writing? \_\_\_\_\_
  - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? \_\_\_\_\_
  - c. Met the Manifest requirements? \_\_\_\_\_
2. Importing Hazardous Waste, has the generator:
  - Met the manifest requirements? \_\_\_\_\_

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

*see attached sheets*

X  
TRANSPORTER REQUIREMENTS  
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

N/A

Are copies of the completed  
manifests or shipping paper(s)  
available for review and  
retained for three years?

-    Yes    No    NI\*    Remarks

\_\_\_\_\_

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the  
manifest the date the waste left the  
U.S.?

\_\_\_\_\_

B. Are signed completed manifest(s)  
on file?

\_\_\_\_\_

V. MISCELLANEOUS

A. Does transporter transport  
hazardous waste into the  
U.S. from abroad?

\_\_\_\_\_

B. Does the transporter mix  
hazardous waste of different  
DOT shipping descriptions  
by placing them into a single  
container?

\_\_\_\_\_

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must  
comply with the Generator regulations.

\*Not Inspected



①

7-15-81 CEI Ashtabula A+B, C ISS  
 Al Kennedy, Sylvia Washington, Bob WykoFF

- (A) due to infrequency of unit cleaning, safety equipment not installed & not inspected - showers, etc. available in other plant areas  
 personal safety items used daily for all plant operations - individual user inspection
- (B) historically - all training has been on-the-job - new program being instituted
- (C) during a cleaning - signs & P.A. warnings are issued; ~~not~~ no welding, etc. allowed in area
- (D) water available for "decontamination" & acids
- (E) Co. doesn't feel a need to be involved in area emergency planning due to nature of operation
- (F) Water engineer of Phil has plant copy, none out in community, see (E)
- (G) during normal cleaning - wastes are analyzed for process control purposes - toxicity testing not done routinely (Cr & Pb); trial testing only insofar as checking system readiness; treatment monitoring?; continuous operator monitoring

- (H) Haz. Waste plan states plants have no need for closure or post closure plans or cost info - no cleaning would take place after closure!
- (I) outside contractor supplies cleaning solution & tanks - after cleaning - solution directed to treatment plant handles "1st" rinse through UPDES chem waste treat
- (J) all uses of chem waste basin are batch operations of regularly scheduled operations - no mixing  
all wastes to basin are compatible (acidic)
- (K) wastes added to boilers <sup>burned</sup> during normal boiler operation only
- (L) plant not aware of any analysis for heat value, halogen & sulfur content, Hg, Pb  
co. feels that due to long term usage of this ~~type~~ treatment method, analysis is not required per USEPA regs.  
co. believes treatment consists of evaporation, not destructive incineration  
no stack monitoring beyond normal air PTO requirements - note co. indicates this flow to be insignificant compared to overall emission

### General Notes

- 1) Company notes that waste volumes and loadings in application include regnerant neutralization wastes, which have been de-listed.
- 2) Hazardous material for this application consists of acidic cleaning solution. Vertan (trade name) cleaning compound used. Material is not stored on-site; cleaning contractor supplies material for each job.
- 3) Boilers cleaning is an infrequent event - once every 3 or 4 years. Due to overall number of boilers, a cleaning takes place, on average, every 6 to 12 months (entire CEI 5 plant average, approx.)
- 4) Company considered need of listing ignitable wastes in application. However, all waste oils and solvents are sent off-site to reclaimers; therefore, company feels they do not have any ignitable wastes as defined. (261.6)